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6 Attorney for Defendants,
 7 *Vote for the Worst LLC,*
 8 *Nathan E. Palmer, and*
 9 *David J. Della Terza*

9 **UNITED STATES DISTRICT COURT**
 10 **DISTRICT OF NEVADA**

11 RIGHTHAVEN, LLC, a Nevada limited
 12 liability company,

13 Plaintiff,

14 v.

15 VOTE FOR THE WORST, LLC, an Utah
 16 limited-liability company, NATHAN E.
 17 PALMER, an individual; and DAVID J. DELLA
 18 TERZA, an individual

19 Defendants.

Case No. 2:10-cv-01045

**PARTIES' JOINT STIPULATION AND
 REQUEST FOR LEAVE TO EXTEND
 TIME TO FILE DISCOVERY PLAN
 (FIRST REQUEST)**

19 **PARTIES' JOINT STIPULATION
 AND REQUEST FOR LEAVE TO EXTEND TIME TO FILE DISCOVERY PLAN**

20 Defendants Vote for the Worst LLC, Nathan E. Palmer and David J. Della Terza, by and
 21 through their counsel, Randazza Legal Group, and Plaintiff Righthaven LLC, by and through its
 22 counsel Shawn A. Mangano, hereby stipulate to extending the time to file a discovery plan to one
 23 (1) calendar week after the Court decides the Motion to Dismiss (Doc. #33) and related briefing
 24 (Docs. # 40, 43, 44).

25 The parties therefore move this Court to amend its Order filed June 10, 2011 (Doc. # 47)
 26 instructing the parties to file a discovery plan by June 20, 2011. The parties agree that such an
 27 event-based extension for the discovery order's filing would be in the interest of the parties and
 28 judicial economy, as the Court's disposition of the pending motion to dismiss may obviate the

1 need for discovery entirely. The parties do not request this leave from the Court for any
2 improper to dilatory purpose.

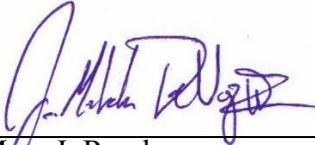
3 Dated: June 13, 2011

4 Respectfully Submitted,

5 SHAWN A. MANGANO, LTD.

RANDAZZA LEGAL GROUP

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20 Marc J. Randazza
21 J. Malcolm DeVoy

22 Attorney for Defendants,
23 *Vote for the Worst LLC,*
24 *Nathan E. Palmer, and*
25 *David J. Della Terza*

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28 **IT IS SO ORDERED:**



29 GEORGE FOLEY, JR.
30 United States Magistrate Judge

31 DATED: June 16, 2011